

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

JULIE BOSTROM and,
SCOTT BOSTROM
Plaintiffs,

vs.

DR. LAWRENCE H. LICHT,

Defendant.

* CIV. 0:11-cv-01880-RHK-LIB

* COMPLAINT AND
* DEMAND FOR JURY TRIAL

PLAINTIFFS COMPLAIN AND ALLEGE:

COUNT ONE

PARTIES

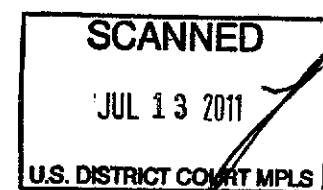
1. Plaintiffs Julie Bostrom and Scott Bostrom are husband and wife and reside at New Effington in the State of South Dakota.

2. At all times relevant hereto, the Defendant, Dr. Lawrence H. Licht, M.D., was a duly licensed physician engaged in providing medical services in the specialty of diagnostic radiology in the City of Breckenridge, Wilkin County, Minnesota.

3. Defendant, Dr. Lawrence H. Licht, M.D., resides in the State of North Dakota.

4. Plaintiffs are residents and citizens of the State of South Dakota; the Defendant is a resident and citizen of the State of North Dakota.

5. A substantial portion of, if not all, events or omissions giving rise to this claim occurred in connection with the care administered to the Plaintiff Julie Bostrom by



the Defendant Lawrence H. Licht, M.D., at the St. Francis Heath Care Campus in Breckenridge, Wilken County, Minnesota.

JURISDICTION AND VENUE

6. For those reasons alleged throughout the Court has jurisdiction over the Defendant and this action pursuant to 28 USC §1332 because there is complete diversity of citizenship between the Plaintiffs and the Defendant and because the amount in controversy exceeds \$75,000.00 exclusive of interest and costs.

7. Venue is properly laid in this District pursuant to 28 USC §1391(a) (2) and (3).

FACTUAL ALLEGATIONS

8. The medical care and services provided to Plaintiff Julie Bostrom by the Defendant, Dr. Lawrence H. Licht, M.D., a diagnostic radiologist, for a lump in her breast from on or about January 5, 2010 to on or about May 4, 2010 were performed negligently and constituted a departure from the standards of practice of diagnostic radiology in the following particulars, among other things, to wit:

- A. Defendant failed to perform or recommend necessary and appropriate testing of the Plaintiff Julie Bostrom;
- B. Defendant failed to refer Plaintiff to appropriate specialists for diagnosis and treatment of her condition in a timely manner;
- C. Defendant was otherwise negligent in the premises.

9. As a proximate result of the negligence of Defendant, Dr. Lawrence H. Licht, M.D., the Plaintiff, Julie Bostrom, was seriously and permanently injured and has been greatly damaged in the following particulars, to wit:

- A. She has been diagnosed with infiltrating ductalobular cancer Bloom-Richardson grade II/III.
- B. She has required chemotherapy, additional surgeries, radiation treatment, and other medical treatment.
- C. She is at great risk of recurrence of cancer.
- D. She has experienced side effects related to needed medical treatment.
- E. Her life expectancy has been greatly diminished.
- F. She has incurred a loss of earnings and her earning capacity has been greatly impaired.
- G. She has experienced and will continue to experience great pain and suffering of body and mind.
- H. She has incurred and will continue to incur medical and hospital expenses in the treatment of her injuries.
- I. She has been otherwise greatly damaged.

LOSS OF CONSORTIUM

10. That all times material to the Complaint Plaintiff Scott Bostrom has been the husband of the Plaintiff Julie Bostrom.

11. By reason of the injuries suffered and sustained by the Plaintiff Julie Bostrom and in an effort to heal, cure, treat, and attempt to relieve the same, Plaintiff Scott Bostrom has been obligated and compelled to incur and pay sums of money by way of medical and hospital expenses.

12. By reason of such injuries suffered and sustained by Plaintiff Julie Bostrom, Plaintiff Scott Bostrom has been deprived of the services of his wife, and his

comfort and happiness in her society and companionship have been impaired and such impairment will long continue.

WHEREFORE, Plaintiffs demand Judgment against the Defendant in a sum which will fully and fairly compensate them for all losses and damages sustained together with interest and costs and for such other and further relief as the Court deems just and equitable in the premises.

Dated this 11th day of July, 2011.



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DEMAND FOR JURY TRIAL

Now come the Plaintiffs by and through counsel and hereby demand a trial by jury.



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